

RECEIVED

JUN 17 2021

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY LM DEPUTY

Tavis Randall at 13603 Woodstone Way, San Antonio, TX 78233

HealthMark Group 325 N. Saint Paul St. #1650, Dallas, TX 75201 and Ridgmont Equity Partners 101 S Tryon Street #3400, Charlotte, NC 28280

US CODE TITLES 2/ 5/ 9 /17 /19/ 20/ 29/ 41

SA21CA0582

Deposition

JKP

This deposition is intended to serve as a formal complaint. I intend to bring to light the careless behavior of a company that has caused me much agony. The company in question is Healthmark. The actions of Healthmark have been deemed to be very unprofessional and life altering due to an action that was preventable and should have been foreseen. I feel that given the amount of distress and time consumption that has been caused, I should be compensated. Back in 2014 I adopted my nephew which led me from Texas to Ohio. During my time in Ohio I ended up getting stabbed and my life changed drastically. I was no longer able to function at 100% and I need medical attention to help in regaining certain functions. In 2016 I relocated with my current job from OH back to TX. When I moved back to TX I chose Urology San Antonio as my new provider from the beginning. I was very happy with all the services that were provided and the staff is amazing. The practice itself spreads over many locations and consists of many staff members, which is to be expected. The workload that they delegate to outside sources is what brings me to my complaint. Healthmark is the outside company contracted to provide medical records for all of the Urology San Antonio locations. I found this information out when my job first requested that I apply for disability given the work accommodations that my injury would require. My first experience in requesting records from Healthmark was very smooth and painless. I reached out to a representative that handled everything efficiently. The issue came about a year later when my job required me to recertify my accommodations. The process would be the same as prior but the execution on Healthmarks part was hardly the same. The inaction of Healthmark to have a back up protocol has led to this deposition.

I requested medical records in order to substantiate my work claim. Upon my initial request I made contact with Healthmark and was assigned a representative **Ashley Madamedon** to assist me. The process required me to receive an invoice online, which would be available with medical records once the invoice was paid. The representative that I was assigned advised me to allow a few days for her to gather all the needed records and she would contact me once the invoice was ready. A few days passed and I received no reply. This led me to contact Healthmark again, as my window to submit the paperwork to my job was limited. Upon my call, I was advised that my representative wasn't in at the moment. I asked if there was anyone else to assist me and was advised just to allow 24 hours for a follow up. They stated that only my representative had my case file at the moment. I obliged and still received no follow up. A few days later passed and I contacted Healthmark again and was able to reach my representative. I was advised of several factors that had hindered the fulfillment of my request and to allow 24 hours for completion. A day passed and no follow up came, again. I reached back out to Healthmark and began to receive a lot of run around about my representative being unavailable and that they were the only ones that could provide the needed information. A

simple request had now turned into a major problem.

It took weeks to fulfill my request for medical records, and during those weeks my job denied my claim for lack of records. The denial did not only cause several accommodations to be removed from my job. It also caused several hours of pay (totalling \$12k) to be denied as well. Then to top it all off, I was fired. \$60k just down the drain. I am currently trying to appeal that decision. The worst part about all of this for me was finding out why I was unable to originally get the records in a sensible time frame. The answer is this: **Ashley Madamedon** was in the process of receiving a career change. I FOUND OUT WEEKS AFTER MY INITIAL REQUEST AND THEN ONLY BY CHANCE. I emailed her one day and it bounced back. I then remembered my initial request and found that email. From there I emailed the initial representative and they were able to shed light on this for me (they were also the ones who provided me with my second set of records).

I believe that Healthmark should compensate me for my losses. The emotional trouble and physical anguish that I am suffering is undescribable. I have had to relocate my family and one point in time lived in my car. After careful consideration, I believe the amount of \$6,700,000 is roughly adequate.

6/17/21
 